

# Fact Sheet



## For Final Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on October 31, 2012.

Permit Number: **R30-08300019-2012**

Application Received: **July 1, 2014**

Plant Identification Number: **03-54-08300019**

Permittee: **Columbia Gas Transmission, LLC**

Facility Name: **Files Creek Compressor Station**

Mailing Address: **1700 MacCorkle Avenue SE, Charleston, WV 25314**

Permit Action Number: *SM02*

Revised: *March 31, 2015*

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|--------------------|---|
| Physical Location: | Beverly, Randolph County, West Virginia   |
| UTM Coordinates:   | 601.1 km Easting • 4,297.3 km Northing • Zone 17  |
| Directions:        | The station is located on Files Creek Road and WV Secondary Route 37/8, approximately 3 miles south of the town of Beverly. |

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### Facility Description

Files Creek Compressor Station is a natural gas transmission facility covered by Standard Industrial Classification (SIC) Code 4922 and North American Industrial Classification System (NAICS) Code 486210. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of two (2) 10,682-hp (at 0° F) turbines (they replace six reciprocating internal combustion engines (E01 through E06) which will be permanently removed at or before the conclusion of a shakedown period (not to exceed 180 days after turbines start-up)), (4) 2,000-hp natural gas fired reciprocating compressor engines, three (3) natural gas fired emergency generators, a wastewater evaporation injection system and numerous storage tanks of various sizes. For comfort heating purposes the facility also operates a number of small space heaters.

This modification is covered by recently issued permit R13-3164A and includes:

- change of the heat input of the line heater HTR2 from 1.09 MMBtu/hr to 0.65 MMBtu/hr,
- installation of a second line heater HTR4 rated at 0.65 MMBtu/hr,
- installation and operation of a 1,000 gallon new glycol tank, a 1,000 gallon used glycol tank, 1,000 gallon used lube oil tank, 1,000 gallon waste oil tank, and a 1,000 gallon oil/water separator.
- Correcting the number of catalytic heaters from 40 to 85, and their maximum capacities.

### Emissions Summary

| Pollutant                              | Potential emissions before modification (TPY) | Change in potential emissions (TPY) | Potential emissions after modification (TPY) |
|--|---|-------------------------------------|--|
| Carbon Monoxide (CO)                   | 211.36  | 0.07                                | 211.43                                       |
| Nitrogen Oxides (NO <sub>x</sub> )     | 939.69  | 0.09                                | 939.78                                       |
| Particulate Matter (PM <sub>10</sub> ) | 28.19   | 0.01                                | 28.20  |
| Total Particulate Matter (TSP)         | 28.19   | 0.01                                | 28.20  |
| Sulfur Dioxide (SO <sub>2</sub> )      | 0.77  | 0                                   | 0.77   |
| Volatile Organic Compounds (VOC)       | 46.55   | 0                                   | 46.55  |
| Formaldehyde                           | 16.92   | 0                                   | 16.92  |
| Total HAPs                             | 24.43   | (0.02)                              | 24.41  |

### Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 939.78 tons/yr of NO<sub>x</sub>, 211.43 tons/yr of CO and 16.92 tons/yr of Formaldehyde. Due to this facility's potential to emit over 100 tons per year of criteria pollutant and over 10 tons per year of an individual HAP, Columbia Gas Transmission, LLC's Files Creek Compressor Station is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

### Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

|                    |  |   |
|--------------------|--|---|
| Federal and State: | 45CSR2<br>45CSR13<br>45CSR30<br>45CSR34<br>40 C.F.R.63 Subpart DDDDD | Indirect Heat Exchangers<br>Construction Permit<br>Operating permit requirement.<br>MACT<br>Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units |
|--------------------|--|---|

State Only: None

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

### Active Permits/Consent Orders

| Permit or<br>Consent Order Number | Date of<br>Issuance | Permit Determinations or Amendments That<br>Affect the Permit ( <i>if any</i> ) |
|-----------------------------------|---------------------|---|
| R13-3164A                         | December 19, 2014   | N/A   |

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

### Determinations and Justifications

Below is a discussion of changes to the permit.

1. Emission Units and Listing of Applicable Requirements: Table 1.0 was updated with new equipment (line heater HTR4 and Tanks C09 through C13), revised number of catalytic heaters HTR3, corrected capacity of line heater HTR2 and catalytic heaters HTR3, and added new applicable requirements for line heater HTR4.
2. 40 C.F.R. Part 63 Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*.

Heater HTR2 and the proposed heater HTR4 are classified as process heaters under the NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (40 C.F.R. 63 Subpart DDDDD) and therefore are affected sources under the subpart. The heaters are designed to burn natural gas (Gas 1 Unit) and will have a heat input rating of 0.65 MMBtu/hr. These key features (natural gas and less than 5 MMBtu/hr heat input) makes them only subject to the work practice requirements of this subpart. The permittee will be required to conduct tune-ups to the heaters once every five years. These requirements and the corresponding reporting were incorporated in Section 8.0 of R13-3164A.

3. 45CSR2:

Heater HTR2 and the proposed heater HTR4 are subject to 45CSR§2-3 (applicable requirements are included in Section 4 of the permit). According to 45CSR§2-11.1, the heaters are exempt from 45CSR§§2-4, 5, 6, 8 & 9 because their design capacity is 0.65 MMBtu/hr each (under 10 MMBtu/hr).

4. Emission Unit C13 was mistakenly described as "Oil/Water Tank" in the underlying permit R13-3164A, but in fact it is an Oil/Water Separator as explained by the company in an e-mail dated February 5, 2015.
5. Appendix A was updated to include recently issued permit R13-3164A.

### Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

1. 40 C.F.R. Part 60 Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*.  
The proposed fuel pre-heater HTR4 is rated for 0.65 MMBtu/hr, therefore it doesn't meet definition of affected source in this subpart (units between 10 MMBtu/hr and 100 MMBtu/hr). Thus, the proposed fuel preheater is not subject to the standards under Subpart Dc.
2. 40 C.F.R. 60 Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984* – per §60.110b(a), new Tanks (C09 through C12) are not subject to the requirements of this Subpart because their size is below applicability threshold (75 cubic meters).
3. 40 C.F.R. 63 Subpart VV, *National Emission Standards for Oil-Water Separators and Organic-Water Separators*. The Oil-Water Separator C13 is not subject to this subpart because per §63.1040, "The provisions of this subpart apply to the control of air emissions from oil-water separators and organic-water separators for which another subpart of 40 CFR parts 60, 61, or 63 references the use of this subpart for such air emission control", and this separator is not subject to a subpart of 40 C.F.R. 60, 61, or 63 that references the use of the Subpart VV.
4. 45CSR10 – According to 45CSR§10-10.1, the proposed heater HTR4 is exempt from 45CSR§§10-3, 6, 7 & 8. The heater is also exempt from 45CSR§§10-4 and 5, because the facility is not a manufacturing process source operation and does not involve combustion of refinery or process gas streams.
5. 40 C.F.R. 64 – Proposed emission sources being added to the facility do not have add-on controls; therefore, in accordance with 40 C.F.R. § 64.2(a), CAM is not applicable to this facility.

### Request for Variances or Alternatives

None

### Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

### Comment Period

Beginning Date: February 11, 2015  
Ending Date: March 13, 2015

### Point of Contact

All written comments should be addressed to the following individual and office:

Natalya V. Chertkovsky-Veselova  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1220 • Fax: 304/926-0478  
Natalya.v.chertkovsky@wv.gov

## **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

## **Response to Comments (Statement of Basis)**

1. While this permit was out to notice, the following two typos were discovered and corrected in the Table of Contents: in the item 11.0 word “Compression” was replaced with “Spark”, and in the item 12.0 word “Spark” was replaced with “Compression”.
2. On February 19, 2015 and March 23, 2015 we received comments from EPA Region 3’s Senior Environmental Engineer Paul Wentworth. These comments did not result in any changes to the permit. The summarized comments and our responses are provided below:

2.1. Comment #1 regarding Table 1.0: EPA has concerns regarding wholesale incorporation by reference of applicable requirements in a Title V permit. This comment is based on petition number VI-2007-02.

For comment #1, we agreed to defer this issue until later as it impacts not only this Title V permit, but all Columbia Gas Title V permits which were written in this similar format.

2.2. Comments #2, #3, #4, and #5 regarding condition 2.14: “At all reasonable times” is an undefined term and therefore not federally enforceable. The permit must include language defining this term or specify times when the authorized representative of the secretary is allowed entry to inspect the facility.

Condition 2.14 which references “At all reasonable times” and “reasonable” comes directly from our Rule 30 (45CSR30) which is SIPed. Changing this language would require a change to our Rule 30.

2.3. Comment #6 regarding condition 5.1.8: All federally enforceable emissions standards and requirements cannot be bypassed during periods of startup and shutdown unless there is language in the federal requirements that permit requirements are to be bypassed. Any state language allowing emission standards compliance to be suspended during startup and shutdown must designate these as state only requirements enforceable only by the state.

Condition 5.1.8 in this permit is derived directly from 45CSR§2-9.1 of West Virginia’s legislative rule 45CSR2 which is incorporated in WV’s SIP. In order to change this condition, the underlying state rule would need to be revised, which is beyond the scope of this significant modification. EPA is addressing supplemental proposed rulemaking on affirmative defense provisions for SSM provisions in state regulations in a separate rulemaking.

2.4. Comment #7 regarding condition 6.3.1: The term “reasonable times” must be defined.

This is boilerplate language for all the Columbia Gas Title V permits and was not modified as part of this significant modification. This language serves as gap-filling language for testing in the event that an engine is subject to an emission limitation, but testing requirements have not been specified in the applicable state rule, federal regulation, 45CSR13 or 45CSR14 permit, or consent order.

2.5 Comment #9 (there was no comment #8) regarding R13-3164A condition 5.2.2: The language is incorrect – it does not reflect the language in 40 C.F.R. §60.8(a). The following correct language from 40 CFR§60.8(a) should be used instead: “(a) Except as specified in paragraphs (a)(1), (a)(2), (a)(3), and (a)(4) of this section, within 60 days after achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup of such facility.....”

This requirement is contained in R13-3164A which was issued on December 19, 2014 and is included in the Title V permit as an attachment. We cannot change the R13 permit conditions as part of this Title V significant modification. Also, the condition in question was not changed as a result of the changes requested in R13-3164A and this Title V significant modification. This language was included this way when R13-3164 was approved. However, while this incorrect language is included as an attachment to the Title V permit, the Table in Section 1.0 of the Title V permit lists 40 C.F.R. §60.8 as an applicable requirement instead of restating the incorrect language from R13-3164A.